# **EXHIBIT F**

From: Seth Jones < seth@consultmts.com > Sent: Wednesday, August 23, 2023 2:21 PM

To: Meier, Peter C. petermeier@paulhastings.com

Cc: Altamirano, Chris < <a href="mailto:chrisaltamirano@paulhastings.com">chrisaltamirano@paulhastings.com</a>; Dhillon, Navi < <a href="mailto:navidhillon@paulhastings.com">navidhillon@paulhastings.com</a>; Unger, Sean

<seanunger@paulhastings.com>; Monique Rydel-Fortner <monique@consultmts.com>

Subject: [EXT] Re: Demand for Preservation of Electronically Stored Information and Other Evidence

## --- External Email ---

Hi Pete,

I have told you we are pro se and we are looking for a lawyer. I can not respond. But I object to the requests in the subpoena because they are burdensome, not related to litigation and violate my first amendment rights.

Again I'm looking for a lawyer and once I find one my representative will reach out.

Seth Jones

Sent from my iPhone

On Aug 23, 2023, at 12:00 PM, Meier, Peter C. < <a href="mailto:petermeier@paulhastings.com">petermeier@paulhastings.com</a>> wrote:

Yes, I'm happy to explain that. Cooperation means agreeing to accept service of the subpoena that is directed to you personally (see attached). If you can confirm in reply to this email that you agree to accept service of this subpoena (through my email to you), we can offer the extension referenced in my earlier email to you, Below the Blue, and MTS, assuming each of you are agreeing to provide documents on a rolling basis.

Best regards, Peter

From: Seth Jones < seth@consultmts.com>
Sent: Wednesday, August 23, 2023 11:37 AM

**To:** Meier, Peter C. < <a href="mailto:petermeier@paulhastings.com">petermeier@paulhastings.com</a>>

**Cc:** Altamirano, Chris < <a href="mailto:chrisaltamirano@paulhastings.com">chris</a> <a href="mailto:phillon">chrisaltamirano@paulhastings.com</a> ; Dhillon, Navi

<<u>navidhillon@paulhastings.com</u>>; Unger, Sean <<u>seanunger@paulhastings.com</u>>; Monique Rydel-Fortner

<monique@consultmts.com>

Subject: [EXT] Re: Demand for Preservation of Electronically Stored Information and Other Evidence

#### --- External Email ---

For clarification - can you explain "cooperation from you in accepting service". I have had no one ask me in person to accept service or to give me a subpoena.

Sent from my iPhone

Dear Seth,

In light of our need for the information we are seeking in the subpoenas, we can only offer an extension of time based on cooperation from you in accepting service and producing the documents requested (consistent with my prior email). Based on your response to my last email, we do not have an agreement to extend the time for any responses to the subpoenas we have served.

Should you change your mind as to our proposal, please let us know. Also, if you retain legal counsel please have your counsel contact us to continue any discussions regarding the subpoenas.

Best regards,

Peter

From: Seth Jones < seth@consultmts.com>
Sent: Tuesday, August 22, 2023 5:08 PM

To: Meier, Peter C. <petermeier@paulhastings.com>

**Cc:** Altamirano, Chris <<u>chrisaltamirano@paulhastings.com</u>>; Dhillon, Navi

<navidhillon@paulhastings.com>; Unger, Sean <seanunger@paulhastings.com>;

Monique Rydel-Fortner < monique@consultmts.com >

Subject: [EXT] Re: Demand for Preservation of Electronically Stored Information and

Other Evidence

### --- External Email ---

Hi Peter,

We need a 4-6 week extension. We are unrepresented currently and need time to hire proper counsel for such a request. We currently can not agree to the terms in your email.

# Case 2:21-cv-00073-JDP Document 65-18 Filed 09/26/23 Page 4 of 6

Thanks in advance for the extension,

Seth Jones

Sent from my iPhone

On Aug 16, 2023, at 9:06 PM, Meier, Peter C. <petermeier@paulhastings.com> wrote:

Seth,

Following up on my earlier email, we will need your agreement to accept service of the subpoena that is directed to you personally (see attached). If you agree to accept service, we can offer the extension referenced in my earlier email to you, Below the Blue, and MTS, assuming each of you agree to provide documents on a rolling basis.

Best regards,

Peter Meier

From: Meier, Peter C.

Sent: Wednesday, August 16, 2023 11:09 AM

**To:** 'Seth Jones' < seth@consultmts.com >; Altamirano, Chris

<chrisaltamirano@paulhastings.com>

**Cc:** Dhillon, Navi <<u>navidhillon@paulhastings.com</u>>; Unger, Sean <<u>seanunger@paulhastings.com</u>>; Monique Rydel-Fortner

<monique@consultmts.com>

**Subject:** RE: Demand for Preservation of Electronically Stored Information and Other Evidence

Hi Seth -

Thank you for the email and confirming you received the subpoenas. We agree to provide 30 days to respond but ask that you provide documents on a rolling basis - prioritizing documents that are easily accessible and readily available. Also, we will need your agreement to cooperate with the service of subpoenas going forward.

If you have legal counsel, please ask them to contact us.

Best regards, Peter Meier

From: Seth Jones < seth@consultmts.com > Sent: Tuesday, August 15, 2023 1:19 PM

To: Altamirano, Chris <chrisaltamirano@paulhastings.com>

# Case 2:21-cv-00073-JDP Document 65-18 Filed 09/26/23 Page 5 of 6

Cc: Meier, Peter C. <petermeier@paulhastings.com>; Dhillon, Navi

<navidhillon@paulhastings.com>; Unger, Sean

<seanunger@paulhastings.com>; Monique Rydel-Fortner

<monique@consultmts.com>

Subject: [EXT] Re: Demand for Preservation of Electronically Stored

Information and Other Evidence

#### --- External Email ---

Hi Navi,

We would like to request a 6 week extension in the due date for producing materials related to the subpoenas for:

Below the Blue

As well as

Marine Taxonomic Services

We received the BtB Subpoena legally but actually do not have a binding one for MTS even though a server left one randomly on a desk inside one of our office buildings on the 10th of Aug.

Regardless we are requesting a delay in response due to to far reaching nature of this document and the fact that finding the appropriate Lawyer and answering such a request will take months.

Thank you in advance for this extension,

Seth Jones

Sent from my iPhone

On Jul 18, 2023, at 5:21 PM, Altamirano, Chris <a href="mailto:chrisaltamirano@paulhastings.com">chrisaltamirano@paulhastings.com</a> wrote:

On behalf of Peter C. Meier, please see attached correspondence. A physical copy of this letter will be delivered to you as well.

Thank you, Chris Altamirano

# Case 2:21-cv-00073-JDP Document 65-18 Filed 09/26/23 Page 6 of 6 Chris Altamirano | Client Service Specialist

Paul Hastings LLP | 101 California Street, Forty-Eighth Floor, San F Direct: +1.415.856.7415 | Main: +1.415.856.7000 | Mobile: +1.5 chrisaltamirano@paulhastings.com | www.paulhastings.com

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